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August 28, 2023

**VIA ECF**

Honorable Leda Dunn Wettre  
United States Magistrate Judge  
United States District Court  
Martin Luther King Jr. Federal Building & Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: United States of America v. Thomas Nicholas Salzano  
Crim. No. 22-690 (EP) (LDW)

Dear Judge Wettre:

I represent Defendant Thomas Nicholas Salzano.

Enclosed is a proposed order to modify Mr. Salzano's bail conditions to allow him install and access the FTK Imager program and access YouTube (solely to watch FTK Imager training videos). FTK Imager is the program that the Government uses and recommends the defense use to access the discovery produced by the Government. Both the Government and Pretrial Services consent to the proposed form of order.

If Your Honor wishes to address this further with counsel, of course, I am available at the Court's direction.

Thank you for your thoughtful consideration.

Respectfully submitted,

s/ HENRY E. KLINGEMAN  
henry@klingemanlaw.com

cc: Pretrial Services Officer Andrew Dziopa (by ECF/email)  
AUSAs Jonathan Fayer & Lauren Repole (by ECF)

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*Attorneys for Defendant Thomas Nicholas Salzano*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA

vs.

THOMAS NICHOLAS SALZANO,

Defendant.

Honorable Leda Dunn Wettre  
United States Magistrate Judge

Crim. No. 22-690 (EP/LDW)

**CONSENT ORDER**

**THIS MATTER** having been opened to the Court by Klingeman Cerimele, Attorneys (Henry E. Klingeman, Esq., appearing), attorneys for defendant Thomas Nicholas Salzano, for an Order Modifying Bail Conditions to permit access to FTK Imager and YouTube; with notice to and consent by the United States of America (AUSA Jonathan Fayer, appearing) and notice to and with the positive recommendation of the United States Pretrial Services Agency (by Pretrial Services Officer Andrew Dziopa); and for good cause shown,

**IT IS** on this \_\_\_\_\_ day of August of 2023,

**ORDERED** that the Defendant Thomas Nicholas Salzano's bail conditions shall be modified by adding the following terms:

1. The defendant may install and access on his Laptop:
  - a. FTK Imager to review discovery produced by the Government; and
  - b. YouTube to watch FTK Imager training videos only.

2. Apart from this modification, all other terms and conditions of release shall remain in full force and effect.

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HONORABLE LEDA DUNN WETTRE  
United States Magistrate Judge